

# **EXHIBIT B**

## **DECLARATION OF**

**MICHAEL J. HUI**



SILICON VALLEY  
ANN ARBOR  
ATLANTA  
AUSTIN  
BEIJING  
BOSTON

LOS ANGELES  
NEW YORK  
SAN DIEGO  
SAN FRANCISCO  
SÃO PAULO  
SINGAPORE

April 4, 2025

Via Email

Terry Ahearn, Managing Counsel  
Tesla, Inc.  
[tahearn@tesla.com](mailto:tahearn@tesla.com)

Re: Former Employment of Zhongjie “Jay” Li

Dear Terry,

I write to respond to your letter, dated March 27, 2025, which was received by Zhongjie “Jay” Li on March 31, 2025. Please direct all further communications to me at [mhui@gunder.com](mailto:mhui@gunder.com).

Your letter contains serious allegations but lack sufficient details for Mr. Li to meaningfully respond. I encourage you to contact me so we can discuss the issues you raised in greater detail.

Very truly yours,

*Michael J. Hui*

Michael J. Hui  
Of Counsel

MJH/jae

**Joanne A. Ely**

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**From:** Joanne A. Ely  
**Sent:** Friday, April 4, 2025 4:01 PM  
**To:** tahearn@tesla.com  
**Cc:** Michael J. Hui  
**Subject:** Former Employment of Zhongjie "Jay" Li  
**Attachments:** Proception Inc. - Response to T. Ahearn Letter.pdf

Hi Mr. Ahearn,

Please find the attached correspondence from Michael Hui regarding the above-referenced matter.

Best,

Joanne

**Joanne A. Ely**

Legal Secretary

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jely@gunder.com  
Direct: 858 436 8036  
Silicon Valley  
**gunder.com**



GUNDERSON DETTMER STOUGH VILLENEUVE FRANKLIN & HACHIGIAN, LLP  
Silicon Valley | Ann Arbor | Atlanta | Austin | Beijing | Boston | Los Angeles | New York | San Diego | San Francisco | São Paulo | Singapore

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